

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UMG RECORDINGS, INC., et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 1:17-cv-00365-DAE-AWA
	)	
GRANDE COMMUNICATIONS	)	
NETWORKS LLC,	)	
	)	
Defendant.	)	
	)	

**PLAINTIFFS' OBJECTIONS AND COUNTER-DESIGNATIONS TO  
DEFENDANT GRANDE COMMUNICATIONS NETWORKS LLC'S  
DEPOSITION DESIGNATIONS**

Plaintiffs submit the following Objections and Counter-Designations to Defendant Grande Communications Networks, LLC's Deposition Designations pursuant to the Court's Order Setting Jury Selection/Trial and Related Deadlines (ECF No. 275). Plaintiffs reserve the right to amend these objections and counter-designations, and to interpose additional objections and counter-designations, based on evidence or arguments that Grande presents or attempts to present at trial.

<b>Code</b>	<b>Objection</b>
A	Argumentative
ATTY	Attorney objections/colloquy not removed
AA	Asked and answered/duplicative
BER	Best Evidence Rule
C	Compound
CC	Calls for conclusion
D	Designation incomplete; incomprehensible
IH	Improper hypothetical
SM	Subject to a pending/forthcoming motion
M	Misstates prior testimony
NR	Non-responsive
O	Overbroad
V	Vague and ambiguous
30(b)(6)	Outside the scope of the Fed. R. Civ. Proc. 30(b)(6) deposition topics for which witness was designated
103	Assumes facts not in evidence
104	Lacks foundation

402	Not relevant
403	Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence.
408	Settlement Negotiations
501	Privilege
602	Calls for speculation; speculative
611c	Leading
701	Improper opinion by lay witness
702	Improper opinion by expert
802	Hearsay
901	Not properly authenticated

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Dated: January 30, 2020

Respectfully submitted,

By: /s/ Andrew H. Bart  
 Andrew H. Bart (admitted *pro hac vice*)  
 Jacob L. Tracer (admitted *pro hac vice*)  
**Jenner & Block**  
 919 Third Avenue  
 New York, NY 10022  
 Telephone: (212) 891-1600  
 Facsimile: (212) 891-1699  
 abart@jenner.com  
 jtracer@jenner.com

Jonathan E. Missner (admitted *pro hac vice*)  
 Robert B. Gilmore (admitted *pro hac vice*)  
 Philip J. O'Beirne (admitted *pro hac vice*)

Michael A. Petrino (admitted *pro hac vice*)  
Kevin J. Attridge (admitted *pro hac vice*)  
**Stein Mitchell Beato & Missner LLP**  
901 15<sup>th</sup> Street, N.W., Suite 700  
Washington, DC 20005  
Telephone: (202) 737-7777  
Facsimile: (202) 296-8312  
jmissner@steinmitchell.com  
rgilmore@steinmitchell.com  
pobeirne@steinmitchell.com  
mpetrino@steinmitchell.com  
kattridge@steinmitchell.com

Daniel C. Bitting (State Bar No. 02362480)  
Paige A. Amstutz (State Bar No. 00796136)  
**Scott Douglass & McConnico LLP**  
303 Colorado Street, Suite 2400  
Austin, TX 78701  
Telephone: (512) 495-6300  
Facsimile: (512) 495-6399  
dbitting@scottdoug.com  
pamstutz@scottdoug.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 30, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(b)(1).

*/s/ Daniel C. Bitting* \_\_\_\_\_  
Daniel C. Bitting